

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address NEXUS BANKRUPTCY BENJAMIN HESTON (297798) 3090 Bristol Street #400 Costa Mesa, CA 92626 Tel: 949-312-1377 Fax: 949-288-2054 ben@nexusbk.com <input type="checkbox"/> Debtor appearing without an attorney <input checked="" type="checkbox"/> Attorney for Debtor(s)	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: DEAN ROBERT TAPIE, Debtor(s).	CASE NO.: 8:25-bk-11235-SC CHAPTER: 7 DEBTOR'S MOTION TO EXTEND TIME TO FILE CASE OPENING DOCUMENTS (with supporting declaration) [FRBP 1007(c), LBR 1007-1(b)]

1. The Debtor requests an extension of time under FRBP 1007(c) and LBR 1007-1(b) to file the following:

- ☒ One or more schedules (A/B – J) ☐ Chapter 13 Plan ☒ Statement of Financial Affairs
☒ Statement of Current Monthly Income (B 122A, B 122B, B 122C)
☒ Debtor's Certification of Employment Income
☒ Other (*specify*):
Statement of Intentions, Statement of Related Cases

Note: Do not use this form to request an extension of time to obtain the credit counseling required under 11 U.S.C. § 109(h)(1). If the Debtor did not obtain credit counseling before filing the petition, any requests for an extension of time to satisfy the requirement must be made with a certification of exigent circumstances explaining the reason(s) for such a request.

2. Date bankruptcy case filed: 5/7/2025
3. Date of § 341(a) meeting of creditors: 6/18/2025
4. Debtor requests extension to and including (extension deadline) (*date*): 6/4/2025

5. Declaration regarding the reason(s) for extension (*explain*):

See attached Declaration of Benjamin Heston.

Debtor acknowledges that denial of this motion or failure to file the required documents by the extended deadline may result in dismissal of the case and a determination that the Debtor is not eligible for any bankruptcy relief for 180 days.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/21/2025	/s/Benjamin Heston
Date	Signature of Attorney for Debtor

NEXUS BANKRUPTCY
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Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re:

DEAN ROBERT TAPIE,

Debtor.

Case No.: 8:25-bk-11235-SC

Chapter 7

**DECLARATION OF BENJAMIN
HESTON RE: DEBTOR'S MOTION TO
EXTEND TIME TO FILE CASE
OPENING DOCUMENTS**

I, Benjamin Heston, declare as follows:

1. I am the attorney of record for the Debtor. I have personal knowledge of all matters stated herein. On all matters stated on information and belief, I believe those allegations to be true. I could competently testify to the allegations contained herein.
2. Since the filing of the petition, I have been actively working with the Debtor to collect the necessary documentation and information required to complete the bankruptcy filing. As of today, I am still awaiting certain required documents, including proof of income from two W-2 jobs, self-employment, and Social Security benefits for both the Debtor and the Debtor's spouse. Without these materials, the case commencement documents cannot yet be filed with full confidence that they are complete and accurate.
3. Additionally, over the past several weeks, my availability has also been limited due to trial preparation and proceedings in (*Complete Industrial Repair, Inc. v. Torres*, Adv. No. 2:23-ap-01426-DS), which concluded on May 20, 2025 before the Honorable Judge Saltzman.

1 4. Given these circumstances, I respectfully request that the Court grant an extension of
2 time for the Debtor to file her case commencement documents.

3 5. I declare under penalty of perjury under the laws of the United States and the State of
4 California that the foregoing is true and correct.

5
6 Date: May 21, 2025


Benjamin Heston

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**3090 Bristol Street #400
Costa Mesa, CA 92626**

A true and correct copy of the foregoing document entitled (*specify*): **DEBTOR'S MOTION TO EXTEND TIME TO FILE CASE OPENING DOCUMENTS** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 5/21/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Karen S Naylor (TR) alane@ringstadlaw.com, knaylor@IQ7technology.com;ecf.alert+Naylor@titlexi.com
United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 5/21/2025 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed (state method for each person or entity served):

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/21/2025
Date

Benjamin Heston
Printed Name

/s/Benjamin Heston
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.